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July 1, 2008

MEMO ENDORSED

Via Facsimile: (212) 805-7930

Honorable James C. Francis
United States Magistrate Judge
Daniel Patrick Moinahan United States Courthouse
500 Pearl Street, Room 1960
New York, NY 10007

RE: **GREEN v. ADVANCED CARDIOVASCULAR**

Our File No.: (AP) 54937

Docket No. 07 CV 3141

Dear Honorable Sir:

Our office represents the interest of Advance Cardiovascular Imaging with respect to the above-referenced matter. I write to the Court, respectfully requesting an extension of time to complete discovery in this matter. All parties have consented to this request.

Briefly, this is a malpractice/wrongful death action of a man with a most extensive and complex medical history. Unfortunately, discovery was stalled due to the great difficulty we have had obtaining the relevant medical records, specifically from Mt. Sinai Medical Center and Dr. Jeffrey Moses. However, we most recently received 1,200+ pages of records from Mt Sinai.

At this juncture, the deposition of the plaintiff has been scheduled for July 23, 2008. We expect that the remainder of the party depositions will be completed by September 15, 2008. Accordingly, we would respectfully request an extension of time to complete the necessary discovery including the exchange of expert information and expert depositions.

I thank the court for its time and attention.

Respectfully submitted,

JAMES A. PANNONE

7/2/08
All fact discovery shall be completed by September 15, 2008. Expert reports shall be exchanged by October 15, 2008, and expert discovery shall be completed by November 14, 2008. The deadline for submitting the pretrial order or any dispositive motions is extended to December 15, 2008.

SO ORDERED.
James C. Francis II
USMJ

JAP/mt

cc:

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